

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

JUNIPER NETWORKS, INC.

Defendant.

Civil Action No.: 6:20-cv-00812-ADA  
6:20-cv-00813-ADA  
6:20-cv-00814-ADA  
6:20-cv-00815-ADA  
6:20-cv-00816-ADA  
6:20-cv-00902-ADA  
6:20-cv-00903-ADA

**JURY TRIAL DEMANDED**

**DEFENDANT JUNIPER NETWORKS, INC.'S RESPONSE TO PLAINTIFF'S  
PREMATURE CASE READINESS STATUS REPORT**

Defendant Juniper Networks, Inc. ("Juniper") hereby responds to Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development's ("Brazos") improper unilaterally filed Case Readiness Status Report. As the Court's November 19, 2020 Standing Order Regarding Notice of Readiness for Scheduling Conference in Patent Cases ("Order") makes clear, "the Parties shall *jointly* file the Case Readiness Status Report." Order at 1 (emphasis added). And, as Juniper pointed out to Brazos, the Order is equally clear that the Case Readiness Status Report is not to be filed until *all* answers or motions in a "set of related cases" have been filed. *Id.* at 1, n.1.

Brazos filed five closely related cases (6:20-cv-00812, -00813, -00814, -00815, and -00816) against Juniper on September 4, 2020, and Juniper filed answers in those five cases on November 16, 2020. Brazos filed two additional closely related cases (6:20-cv-00902 and -00903) against Juniper on September 30, 2020, and Juniper has not yet answered in those cases. Its answers in the latter two cases are due on December 11, 2020. Accordingly, the Case Readiness Status Report should be jointly filed pursuant to the Court's Order *after* December 11, 2020.

When Juniper pointed out that it had not yet answered in all of this "set of related cases" and that it would therefore be improper and inefficient to file the piecemeal Case Readiness Status

Report, Brazos asserted without explanation that the cases are not in fact related. In reality the cases are closely related: in all seven, the same plaintiff has sued the same defendant in the same Court for allegedly infringing seven patents related to the same area of technology (computer networking) and all of which were originally assigned to the same company (Alcatel-Lucent). Because the parties disagreed as to whether it was proper to file the Case Readiness Status Report, Juniper's counsel suggested that the parties jointly contact the Court to request guidance on the issue. Brazos's counsel responded that Brazos would instead simply file the report unilaterally, which it has since done.

In view of the foregoing, Juniper respectfully requests that the Court (a) disregard Brazos's improper unilaterally filed Case Readiness Status Report and (b) direct the parties to jointly file the required Case Readiness Status Report after Juniper has responded in all seven of the above-captioned cases pursuant to the Court's November 19, 2020 Order. Juniper intends to raise pre-*Markman* issues in its Case Readiness Status Report that will apply to each of the seven closely related cases Brazos has filed against Juniper.

Dated: December 3, 2020

/s/ Todd Briggs

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**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on December 3, 2020, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

Dated: December 3, 2020

/s/ Todd Briggs  
Todd Briggs